

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF VERMONT**

GARRET SITTS, et al., PLAINTIFFS, v. DAIRY FARMERS OF AMERICA, INC., and DAIRY MARKETING SERVICES, LLC, DEFENDANTS.	Civil Action No. 2:16-cv-00287-cr
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EXHIBIT A

From: Ray, Sarah (Bay Area)
Sent: Tuesday, September 8, 2020 1:53 PM
To: Dana Zakarian; Joel Beckman; Michael Paris; Elizabeth Reidy
Cc: Pfeiffer, Al (Bay Area); Giordano, Jennifer (DC); Zwisler, Peggy (DC); Barron, Molly (DC); Brown, Chris (DC); tmiller@bakerandmiller.com; Johnson, David (DC); Wisser, Leah (DC)
Subject: Sitts v. DFA - Revised Deposition Designations

Dana,

Below please find our revised objections to plaintiffs' deposition designations for the following witnesses:

- Jay Bryant: Tr. 174:14-175:4 – DFA removes the 402, 403 objection based on this testimony.
- Merrill Reynolds: Tr. 16:8-10 – DFA removes the 106 objection to this testimony.
- Robert Stoddart:
 - Tr. 75:18-76:4 – DFA adds 402, 403, MIL No. 2, and Form (Leading) objections to this testimony.
 - Tr. 80:11-81:17 – DFA adds 403 and Mischaracterization of the Testimony objections to this testimony.
 - Tr. 98:5-10 – DFA removes the MIL No. 2 reference from the objections to this testimony. DFA retains the 402, 403 objections to this testimony independent from its MIL No. 2 arguments.

We note, however, that plaintiffs filed their proposed designations last Thursday, September 3, 2020, despite the fact that we repeatedly told you (most recently a week ago on Monday, August 31) that we would send our revised objections to you in advance of September 10, 2020, when the Court ordered the parties to file their updated designations and objections. Please update the document that you filed with the Court, accordingly. Additionally, please confirm that plaintiffs do not intend to remove any objections to DFA's proposed designations, and we will inform the Court accordingly when we file our designations on September 10, 2020.

Best,
Sarah

Sarah M. Ray

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